

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL MITCHELL

Plaintiff(s),

vs.

ASA RYAN AEGROOF / ASA KARIN DOOLEY

ASA KATHY COSTA / ASA NANCY NAZARIAN

ASA NAOMI TOVAR / EILEEN
O'NEILL

Defendant(s). CHIEF STATE'S
ATTORNEY

1:25-cv-02545
Judge Matthew F. Kennelly
Magistrate Judge Beth W. Jantz
Random/Cat. 2

RECEIVED

MAR 11 2025 BR

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is Michael Mitchell.

If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.

ASA DE GROOT - ASA KATHY COSTA ASA NANCY TOVAR
ASA NANCY TOVAR
STATE'S ATTORNEY

4. Defendant, ASA KARIN DOOLEY - ASA NANCY NAZARIAN EILEEN O'NEAL, is
(name, badge number if known)

an officer or official employed by Cook County STATE'S ATTORNEY'S OFFICE;
(department or agency of government)

or

an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is 2ND MUNICIPAL DISTRICT COURT, SKOKIE. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about JUNE 2025, at approximately 10:00 a.m. p.m.
(month, day, year)
plaintiff was present in the municipality (or unincorporated area) of SKOKIE
Courthouse Room 207, in the County of Cook,
State of Illinois, at SKOKIE COURTHOUSE ROOM 207,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- searched plaintiff or his property without a warrant and without reasonable cause;
- used excessive force upon plaintiff;
- failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- failed to provide plaintiff with needed medical care;
- conspired together to violate one or more of plaintiff's civil rights;
- Other:

DENIED full discovery. Limited viewing of
discovery. Stated EPD chose not to RELEASE discovery.

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: (*Leave blank if no custom or policy is alleged*): _____

8. Plaintiff was charged with one or more crimes, specifically:

Aggravated battery, CASE # 2024CR0166201
Burglary CASE # 20CR1319701

9. (*Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other"*) The criminal proceedings

are still pending. (*As of Feb 28, 2024*)
 were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹
 Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows _____

 Other: _____

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

10. Plaintiff further alleges as follows: (*Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.*)

- ASA Ryan DeGroot stated in open court there were only 3 hours of discovery available to me, Michael Mitchell pro se litigant. HE CAUSED my bond to be revoked.

- ASA DeGroot offered only 1 hour of viewing this discovery on 3 separate occasions. HE ENLISTED AN INVESTIGATOR to play the video discovery for me to watch. I can only watch it under the supervision of an investigator. This gesture does not comply with the law which states discovery should be turned over for inspection.

DeGroot's deprivation of my evidence is obstruction of justice. The evidence withheld proves my innocence

CASE # 20CR1319701
- ON ANOTHER¹ HE PROSECUTING AGAINST ME, HE IS AWARE THE LEAD DETECTIVE COMMITTED PERJURY. DeGroot ATTEMPTS TO PROSECUTE OUTSIDE OF THE BOUNDARIES OF THE LAW.

11. Defendant acted knowingly, intentionally, willfully and maliciously. DeGroot withheld VALUABLE DOCUMENTS THAT WILL PROVE MY INNOCENCE.

12. As a result of defendant's conduct, plaintiff was injured as follows:

Emotional distress from being without proper discovery or documents to present a case. Mental anguish as a result of losses from my film production assignment. Mental pain and suffering for over 4 years.

13. Plaintiff asks that the case be tried by a jury. Yes No

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff asks for the following relief:

A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;

B. (*Place X in box if you are seeking punitive damages.*) Punitive damages against the individual defendant; and

C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: Michael Mitchell

Plaintiff's name (*print clearly or type*): Michael Mitchell

Plaintiff's mailing address: 719 Asbury Ave

City EVANSTON State IL ZIP 60202

Plaintiff's telephone number: (224) 307-9474.

Plaintiff's email address (*if you prefer to be contacted by email*): worldbefree323@yahoo.com

15. Plaintiff has previously filed a case in this district. Yes No

If yes, please list the cases below.

Any additional plaintiff's must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.

Mitchell
Vs
DeGroot

NOW COMES Michael Mitchell Pro Se litigant with a complaint against Assistant State's Attorney Ryan DeGroot of the 2nd Municipal District Courthouse in Skokie Illinois. ASA DeGroot has deprived me of my rights to a fair trial. He has committed one of the greatest crimes of the court by withholding discovery/evidence from the defense.

On April 19, 2024, DeGroot tried to tender discovery, case 2024CR0166201. He stated in open court there were 3 hours of discovery. He will only allow me to view the 3 hours 1 hour at a time on future court visits. I can only watch it. I do not get a chance to inspect the time codes for tampering or to see if the video has been altered. Just watch under the supervision of an investigator. He stated he will not show me videos on evidence.com. He states the EPD does not want me to see it. DeGroot is fully aware the defense gets ALL discovery. The Evanston police do not decide what evidence is tendered. He tendered police reports, exhibits (aka pictures) from an interview of the witness making statements. Picture exhibits of an interview does nothing for my defense. I need actual footage which he deprives me of. In front of the judge, I stated I needed the cell phone video taken of me being attacked and not just the cell phone video of me defending myself. The interview footage which will show the complaining witnesses admit they attacked me first. The complaining witness admits they had a hidden camera pointed in my daughter's bedroom window. I refused partial discovery. I knew it was more than 3 hours. He lied in open court. ASA DeGroot will go to great lengths to prosecute a case even outside the boundaries of the law. Meanwhile the impartial judge was chastising me for not accepting the partial discovery. DeGroot was then removed from the case. I need the Northern District to resolve these disputes BEFORE my trial starts. Remove him from the courtroom. It is the position of the defense that all cases prosecuted by ASA DeGroot, with an unfavorable verdict over the last 4 years, be dismissed or retried. This dictatorship type conduct and obstruction of justice will result in the 2nd Municipal District as a whole be brought before the Federal courts.

Mitchell
Vs
Dooley and Costa

NOW COMES Michael Mitchell Pro Se litigant with a complaint against Assistant State's Attorneys Karin Dooley 1st chair along with Kaitlyn Costa 2nd chair of the 2nd Municipal District Courthouse in Skokie Illinois. On August 9th, 2024, SA Costa was addressing Judge Murphy regarding discovery/evidence. Judge Murphy asked her how many hours of video do you have? Costa stated, "more than 15 hours". (Northern District please keep in mind they originally said there were only 3 hours. Then later stated there were 5 hours.) Of those 3 hours of video, SA, stated I can only watch 1 hour at a time. After Judge Murphy asked her are they going to tender full discovery. Costa went on to say the most God forsaken statement in court history, she said, "I spoke to my co-counsel about this, the only video we are comfortable with sharing is the 3 hours." I stood there in disbelief. Comfortable is a feeling. The constitution of the United States was not written to appease the feelings of SA Costa and co-counsel SA Dooling. We are in a court of law not a court of feelings. Judge Murphy went on to say, "you have to give him the videos, he won't take pieces of paper", (police reports and photo exhibits of an interview). "You can't say I am not comfortable giving the defendant video". "This is not going to go well for the State in the long run".

Needless to say, the State still chose NOT to tender full discovery. There are two cell phones used to record me being attacked. They are withholding it after a motion to compel. This is a Jim Crow, Neo Nazi, day to day, 2nd Municipal District blueprint of normal court procedure. I need the Northern District to resolve these disputes BEFORE my trial starts. Remove them from the courtroom. Let the record show the chief of the State's Attorney's office is Jim Lynch. It is the position of the defense Jim Lynch is appropriately named Lynch because of his Jim Crow tactics. The decisions of all the SAs to withhold discovery/evidence could be motivated by his position to incarcerate as many minorities as possible. Throughout the courthouse his team is referred to as the 'Lynch Mob'. That is the atmosphere that exist in the 2nd Municipal District.

For the record Northern District, I want to reiterate the statement made by Costa and co-signed by her co-council. The judge ordered them to give all discovery, their reply, "We are not comfortable doing that". LET THAT SINK IN!!!!!! It is the position of the Plaintiff that every case they heard, over the last 4 years with an unfavorable verdict, for a defendant be retried or dismissed. These two literally amended the constitution without being reprimanded. Over a year later I still do not have full discovery and they have set a date for trial for me against the 'Lynch Mob'. Waiting to hear from you.

Mitchell
Vs
Nazarian

NOW COMES Michael Mitchell Pro Se litigant with a complaint against Assistant State's Attorney Nancy Nazarian of the 2nd Municipal District Courthouse in Skokie Illinois. On August 9th of 2024 ASA Nazarian deprived me of my right to a fair trial. Nazarian repeatedly states in open court for months that discovery was complete. I filed a response that depriving me of discovery/evidence is a crime. It violates Section 242, title 18 of the constitution. She replied, "that is in federal court this is state court". She willingly and knowingly obstructed justice. The fact that this case is being heard in state court does not exclude the fact it is against the law in every court. She is acting under the color of law. She should be taken into custody for her crime.

In November of 2024 Nazarian told Judge Paul Pavlus I violated a 'no contact' order then told the judge that I should be sanctioned. The judge took her word for it then had me taken into custody. There was no contact between the complaining witness and me. Nazarian and Judge Pavlus work side by side daily where they conspire to prosecute people who do not have legal counsel. Case in point, Nazarian and Judge Pavlus were engaged in ex parte' communications. While I was on zoom waiting for my case to be called up Nazarian was discussing her displeasure with a defendant who was on zoom but failed to show up. She stated she was sick and tired of the defendant not showing up in court claiming she was ill. When Nazarian realized the zoom was live she turned off the audio. Minutes later Judge Pavlus stated to the defendant, "Mam if you are going to miss court, I am going to need a doctor's note or some type of documents or receipts or an arrest warrant would be issued is that clear?". Together they deprive people of rights. Together they conspire while conducting court proceedings with no regard to the law. She asks the judge to invoke sanctions and subjects' defendants through intimidation. This is tyranny. The court is supposed to be a place where justice is served first not punish without cause.

In December of 2024 Nazarian handed the defendant two flash drives that was supposed to contain over 15 hours of discovery. This is after the 3 previous SAs stated discovery was closed and only 3 hours available for viewing. The flash drive that was tendered after 12 months was blank. Judge Pavlus knew this because of his ex parte' communications with his long-time collaborating partner Nazarian. Judge Pavlus insisted on setting a date for trial knowing the repeated obstruction by the SA.

SA Nazarian biggest crime came when she encouraged the judge to have me sanctioned by having me detained in Cook County jail for what she thought was a 'no contact' in a no contact order. To demonstrate how a tyrant judge collaborates. This same 'no contact' order was heard by another SA and judge. That judge Weaver, a man of integrity, did not see evidence to detain me. However, the tyrant judge and the tyrant SA who's conduct in court proceedings is a travesty of justice did detain me without probable cause. They have no regard to the law. I have a wife, two children, a home and two jobs. With no respect or guilt, they had me confined to Cook County jail for over 40 days. I was deprived of my rights to a fair proceeding (discovery

withheld) then detained in Cook County because SA Nazarian chose to do so. That's tyranny at its best. ASA Nancy Nazarian should not be allowed to prosecute a case in the courts. She should have her license taken because she broke the law. Deprivation of rights by ANYONE under the color of law is still a crime. The constitution should be respected. This dictatorship type conduct and obstruction of justice will result in the 2nd Municipal District as a whole being brought before the Federal courts. It is the position of the Plaintiff, me Michael Mitchell, every case that SA presided over, in the last 4 years, that had an unfavorable verdict for a defendant should be dismissed or retried.

Mitchell
Vs
Sutker-Dermer

NOW COMES Michael Mitchell Pro Se litigant with a complaint against Judge Sutker-Dermer of the 2nd Municipal District Courthouse in Skokie Illinois. The most profound document that bolsters my complaint about deprivation of rights at the 2nd Municipal District landed in her hands months earlier. I wrote a letter addressed to her stating I could not get a fair trial at the Skokie courthouse. Months later the State's Attorneys and judges responded just as I had predicted.

On June 28th, 2024, I presented my cause to Judge Sutker-Dermer for a change of venue. Knowing that I could not get a fair trial I asked for that change. Judge Sutker-Dermer denied me a change of venue and what resulted from that, one judge recusing herself. Another judge told me I don't belong in his courtroom then threatened me. The next 4 State's Attorneys were removed for depriving me of my rights to a fair trial, a crime. Therefore, I'm filing this suit.

Judge Sutker-Dermer told me I can't sue people just to sue them. This lawsuit is a result of the law that was broken by all parties named. She is trying to tell me how to try my case. She told the SAs to give me discovery, they did not. Any judge with integrity would have sanctioned the SAs for withholding. Yet she is giving me directives on how to pursue my case. Let the record show the SAs are withholding evidence of the alleged battery because the battery took place outside of my daughter's bedroom window. Why is that significant, because the neighbor had a hidden camera pointed in my daughter's bedroom window. My daughter was 15 then and now 16. So that hidden camera would have my daughter's room in the background in addition to the attacked. So, Sutker-Dermer and the SA are protecting a pedophile. Judge Sutker-Dermer stated in open court "We are aware of Brady vs Maryland; they will give you; they will provide you with all discovery". The discovery I received is from case law Nothing vs Nothing. I received NOTHING!! She is supposed to be the presiding judge of the 2nd Municipal District Courthouse. This dictatorship type conduct and obstruction of justice will result in the 2nd Municipal District as a whole be brought before the Federal courts. Her protecting them or lack of discipling them makes her as guilty of obstruction as much as the State's Attorneys.

Sutker-Dermer was transferred from 26th St courthouse where many of the defendants were minority. It is the position of the defense that she prejudgets and assumes every person of color is guilty. It is the position of the defense she assumes people of color are of a lower intelligence. Case in point while explaining to her in open court why I need a change of venue she was receiving signals from the SA Nazarian. SA Nazarian was standing to my left. I'm talking to her, but she is looking side-eye at Nazarian as Nazarian was nodding yes/no and giving eye signals and hand gestures. I'm looking directly as Sutker-Dermer and Nazarian exchanging signals like a pitcher and catcher. I have a witness who was in court who will testify to the side-eye by Sutker-Dermer and gestures from Nazarian. It is an insult to the court.

Still in front of her with my motion for a change of venue I informed her of Judge Pavlus' statements. I told her before I went into his courtroom, he asked the staff should I be allowed in his courtroom as a Pro Se litigant. She was ok with that. She stated that's no reason to think

you will not get a fair trial. She advised me I can make an appeal. I advised her I would rather not be sentenced to jail for 50 years then in the 49th year my appeal was acknowledged. In other words, she is suggesting that after I am found guilty I can appeal. She can correct this obstruction now so I can have a fair trial. An appeal would not be needed. Judge Sutker-Dermer seems to have forgotten the laws are made for the people by the people. If she is going to amend them to defend a constituent, I need the Northern District to resolve these disputes BEFORE my trial starts. Remove her from the bench. She should not be wearing that robe if she deprives me while under the color of law. Her lack of respect for the law is offensive. She defended her constituent who was guilty of malfeasance. She does not deserve to arbitrate any case with this pre-civil war approach. Again, Northern District I am not making this up. These comments are not hearsay. They are statements made in open court. I am not filing these complaints with the hopes I will be believed. Transcripts will confirm my allegations. It is the position of the defense every case that Judge Sutker-Dermer presided over, with an unfavorable verdict, for a defendant should be dismissed or retried. THEY ARE BREAKING THE LAW while acting under the color of law. This dictatorship type conduct and obstruction of justice will result in the 2nd Municipal District as a whole be brought before the Federal courts. A second Grey Lord investigation should be done. It is imperative that Chief Judge Timothy Evans be notified and replies to this corrupt activity in the 2nd Municipal District in the Skokie Courthouse. Both he and the Judicial Review board should be held accountable if no actions are taken.

Mitchell
Vs
Pavlus

NOW COMES Michael Mitchell Pro Se litigant with a complaint against Judge Paul Pavlus of the 2nd Municipal District Courthouse in Skokie Illinois. On May 10th, 2025, I appeared before Judge Pavlus in room 206 because the assigned, Judge Murphy of 207 was absent. Before walking in the courtroom Judge Pavlus presented a question to the court staff, present were 2 ASAs, court reporter, clerk, and several others, "we have a Pro Se litigant outside waiting to come in, should we let him in here?" That statement alone should disqualify him from wearing a robe. That very statement discredits his ability to be fair. It contradicts the oath he swore to. When I confronted him about it, he became speechless. Nevertheless, I continued with the proceedings.

Because of the misconduct of other court officials, I filed lawsuits against others to assure I received a fair trial. Apparently, he knew about the lawsuits then stated, "you can sue me if you want, I'm not going anywhere". THAT IS A THREAT, FROM A MAN WHO IS SUPPOSED TO BE AN ARBITOR OF FACTS. It is unbecoming of a judge who is supposed to be impartial. It is the conduct of a tyrant. His arrogance is offensive to the court. On one occasion the SA was making an argument regarding discovery, SA Dooley said "It appears Mr. Mitchell has" (Immediately) I objected to 'what it appears'.... Judge Pavlus didn't make a ruling on my objection he just looked at SA Dooley then said, "go ahead". No respect given to procedure. Later in the proceedings I informed the judge that discovery was not complete. I mentioned to him case law Brady vs Maryland which states I am entitled to all exculpatory evidence. He stated, "we are not honoring Brady vs Maryland". That's the response of a tyrant. This is not an allegation. I have the transcript. The Northern District should not allow such blatant disregard of the laws. Its deprivation at its best. I suggested to the court that I would accept discovery on a flash drive so I can view it. Judge Pavlus stated, "not an option". Now he is engaging in lying from the bench. I am relying on the high court of the Northern District to respond to this Neo Nazi behavior.

Months later another appointed State's Attorney Nazarian was assigned to my case because Dooley and others were dismissed. Before my case was called Judge Pavlus and Nazarian were caught conducting ex parte' communications on live zoom. Nazarian complained to Judge Pavlus she was sick and tired of a defendant who was due to be called. That defendant could not come to court because she was sick and unable. Nazarian then realized the camera and microphone of zoom was on while she was engaged in ex parte' communication she then turned it off. When that defendant informed the court, she had to go to the doctor Judge Pavlus told her "Mam if you are going to miss court, I am going to need a doctor's note or some type of documents or receipts or an arrest warrant would be issued is that clear?". All because Nazarian advised him during what she thought was a discreet conversation about that case.

After witnessing several malfeasances by Judge Pavlus I did file a lawsuit because I knew I could not get a fair trial in his courtroom. Weeks later, one day before that lawsuit against him was supposed to begin he had my locked up based on what SA Nazarian said. She thought I

violated a 'no contact' order. Her words, not the words of the judge who heard to 'no contact' case. That incident was not in the courtroom she practices her malfeasance. Judge Pavlus followed her directions then stated I have no other option but to detain you in Cook County jail. He did have an option. The presiding judge in that 'no contact' interaction stated there was no reason to detain me based on the actual evidence and the 'no contact', it did not take place. Pavlus' decision was based on what SA Nazarian, who might I add, works in his courtroom daily. She suggested I be sanctioned. Yet depriving me of evidence/discovery is ok to do. Nothing is fair in his courtroom. Judge Pavlus does not believe in the laws or oath he swore to. The Northern District should remove him immediately.

I have multiple infractions that I have documented regarding Judge Pavlus. As a Pro Se litigant, I needed to subpoena the State's witness in a case that was before a previous judge who retired. That case is now on Pavlus' bench. That witness was the lead detective for the State. That detective refused to come to court. I asked the presiding judge, Edidin at that time, if I can hire an investigator to locate the detective who refused to show up in court. She granted me through a court order to retain an investigator. In that court order she stated that the court/state will compensate the investigator for his services. Judge Pavlus denied the court order. So, the investigator performed a service with the authorization and intention he would be paid for his services when completed. Judge Pavlus denied the investigator to get compensation for his completed work. He went even further by telling me the only witness I can have are people who actually saw the battery when the complaining witness attacked me. I need to subpoena the State's Attorneys who withheld discovery. I need an expert witness regarding defense. He denied that. I also need a constitutional expert to explain to a jury the rights of a defendant. According to him I cannot subpoena anyone that did not see the altercation. Apparently, this means I cannot subpoena the officers involved. This dictatorship type conduct and obstruction of justice will result in the 2nd Municipal District as a whole being brought before the Federal courts.

Judge Pavlus along with all defendants named are trying to obstruct justice because the alleged battery took place a couple of feet away from where my neighbor had a hidden camera pointed inside my daughter's bedroom window. That is significant because the camera caught the altercation thus in the background it also shows my neighbor hitting me and there is a clear view of my daughter's bedroom. My neighbor was spying on my teenage daughter for over a year. All defendants are aware and refused to charge the neighbor with invasion of privacy and intrusion of seclusion. All the defendants named are protecting a pedophile.

On the very last court date Feb 3, 2025, my case was called up Judge Pavlus asked me if I was ready to go to trial. I again for the 10th time told him I do not have all discovery. He stated, "Yes, you do". I held up the flash drive with the alleged discovery, he ignored me then said see you in April for trial. This again is not an unproven allegation. The transcripts will confirm him depriving me of my rights as he acted under the color of law. I need the Northern District to resolve these disputes BEFORE my trial starts. Remove him from the bench. This is a common occurrence at the 2nd Municipal District in Skokie Illinois. It is the position of the Plaintiff, me Michael Mitchell, every case that Judge Pavlus presided over that had an unfavorable verdict for a defendant should be dismissed or retried.

Mitchell
Vs
Murphy

NOW COMES Michael Mitchell Pro Se litigant with a complaint against Judge Lorrain Murphy of the 2nd Municipal District Courthouse in Skokie Illinois. On April 19th Judge Lorrain Mary Murphy tried to force me to acknowledge and sign for partial discovery/evidence. I told her I need the cell phone video this incident was recorded on. The SA DeGroot was withholding what I needed. She repeated that the State has tendered to me a lot of documents. I tried to explain to her what they want the jury to see vs what the jury needs to see are two different things. She collaborated with the SA who was obstructing justice and Judge Murphy knew it. She kept telling me the 3 hours that SA DeGroot has can be viewed under the supervision of an investigator. In other words, I can't study it. She also stated they will tender to you what they have and at the same time she knew there was a lot more than 3 hours available. She was fully aware there is more discovery/evidence that should have been tendered.

The more Judge Murphy tried to obstruct justice the more partial she was to her constituents. After I continued to refuse partial discovery, she told me I would be held to the same standard as an attorney. In the same breath told me I had to have an attorney to get discovery. She made a mockery of the court. She was not aware I knew my rights. Again, she tried to force me to accept partial discovery/evidence and force me to sit with an investigator to watch the 3 hours of video the state said they had. I refused to acknowledge the 3 hours and refused to sit with an investigator. No other attorney had to do this.

There are too many malfeasances against Judge Murphy to describe so I will just document the interaction she had with the next two SAs after DeGroot was removed for withholding. On August 24th, 2024, after asking me again to accept partial discovery I refused. After more heated exchanges in court Judge Murphy asked the newly appointed SA Costa if they had more than 3 hours of discovery/evidence. SA Costa said, "yes judge there are over 15 hours". Judge Murphy scolded her for admitting that on record. She told them the withholding of the discovery/evidence is going to come back and hurt them in the long run. (ALERT: Northern District, this is the long run). Five SAs withheld evidence that would exonerate me. Three judges did nothing about them withholding even after Costa admitted in open court, her and her co-counsel ASA Dooley were not comfortable tendering the evidence I needed. That makes all who participated in these proceedings guilty of a crime. They all acted under the color of law. They all took an oath then failed to keep it. They deprived me of my rights which are guaranteed by the constitution.

Judge Murphy along with all defendants named are trying to obstruct justice because the alleged battery that took place a couple of feet away from where my neighbor who had a hidden camera pointed inside my daughter's bedroom window. That is significant because the camera caught the altercation as well as my daughter's bedroom in the background. It also shows my neighbor hitting me with a clear view of my daughter's bedroom. All defendants are aware of the hidden camera. They refused to charge the neighbor with invasion of privacy and intrusion upon seclusion. All defendants are protecting a pedophile. They failed to charge the

neighbor.

Judge Murphy should be removed from the bench. She is a tyrant. Let me repeat the previous statement. Two SAs told Judge Murphy they were uncomfortable tendering me discovery/evidence. She did absolutely nothing. I need the Northern District to resolve these disputes BEFORE my trial starts. This dictatorship type conduct and obstruction of justice will result in the 2nd Municipal District as a whole be brought before the Federal courts. This is a common occurrence at the 2nd Municipal District in Skokie Illinois. It is the position of the Plaintiff, me Michael Mitchell, every case that Judge Murphy presided over, in the last 4 years, that had an unfavorable verdict for a defendant be dismissed or retried.

Mitchell
Vs
Tovar

NOW COMES Michael Mitchell Pro Se litigant with a complaint against Assistant State's Attorney Naomi Tovar of the 2nd Municipal District Courthouse in Skokie Illinois. On February 3rd my case was up for status. Currently the 5th State's Attorney, Naomi Tovar was the prosecutor. The 4 previous SAs were removed because they withheld discovery/evidence. Let the record show 4 previous SAs stated there were only 3 hours of discovery/evidence that would be tendered to me, Michael Mitchell Pro Se litigant. Earlier in the proceedings an accomplice SA Costa admitted under pressure from Judge Murphy they had more than 15 hours of discovery/evidence. On the 3rd of February as current Judge Pavlus began proceedings, I asked about me receiving full discovery. SA Tovar made a 'no' head gesture signaling to the judge that discovery was complete. She and he repeated the sentiments of the 4 previous that they would not tender full discovery. At that point I raised the blank flash drive that I received from the previously dismissed SA Nazarian, then I began to ask a question about discovery, he cut me off. Judge Pavlus then asked SA when she wanted to start trial, totally disregarding my question (without me getting full discovery). She looked at her calendar and stated April 17th, 2025.

SA Tovar while working under the color of law has deprived me of my rights that are guaranteed by the constitution. I need the Northern District to resolve these disputes BEFORE my trial starts. Remove her from the courtroom. It is the position of the defense that all cases prosecuted by SA Tovar, in her tenure, with an unfavorable verdict be retried or dismissed. This dictatorship type conduct and obstruction of justice will result in the 2nd Municipal District as a whole be brought before the Federal courts. The head of the State's Attorney office for Cook County Eileen O'Neill has been named in this lawsuit. She must be held accountable.